

TRANSCRIPT

STATES UNITED DISTRICT COURT

DISTRICT OF MASSACHUSETTS

C.A. NUMBER: 04-11924-RGS

IAN J. BROWN, JAMES BROWN AND BARBARA BROWN,
Plaintiffs,

VS

UNITED STATES OF AMERICA,
VERIZON NEW ENGLAND, INC. AND BOSTON EDISON
COMPANY D/B/A NSTAR ELECTRIC,
Defendants.

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RULE 30(b)(6) DEPOSITION OF ADRIENNE M.  
ST. JOHN, taken on behalf of the Defendants,  
pursuant to the applicable provisions of the  
Massachusetts Rules of Civil Procedure, before  
Laurie J. Driggers, a Certified Realtime  
Reporter, Registered Professional Reporter and  
Notary Public in and for the Commonwealth of  
Massachusetts, at the Offices of Prince, Lobel,  
Glovsky & Tye, LLP, 585 Commercial Street,  
Boston, Massachusetts, on April 13, 2005,  
commencing at 9:37 a.m.



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1 A. That's it.

2 Q. Okay. Ms. St. John, are you  
3 familiar with Hartwell Road in the Town of  
4 Bedford?

5 A. I am.

6 Q. Okay. And by the way, just so the  
7 record's clear, there is also a Hartwell  
8 Ave. in Bedford; is that correct?

9 A. No. Hartwell Ave. is in Lexington.

10 Q. And Hartwell Ave. that you speak of  
11 in Lexington, that runs into Hanscom Air  
12 Force Base; is that correct?

13 A. It does.

14 Q. And just so we're clear, we're  
15 speaking about the Hartwell Road in  
16 Bedford, correct?

17 A. Mm-hmm. Yes.

18 Q. Have you ever driven on Hartwell  
19 Road before?

20 A. Yes, I have.

21 Q. Frequently?

22 A. Yes, I have.

23 Q. You say you've been the -- you've  
24 worked for the town for 18 years; is that



1 correct?

2 A. I've been the public works engineer  
3 for 18 years.

4 Q. Okay. How long have you worked for  
5 the town?

6 A. Nineteen-and-a-half.

7 Q. And in that 19-and-a-half years,  
8 how many times could you estimate that  
9 you've driven on Hartwell Road before?

10 A. Hundreds.

11 Q. Okay. So you're very familiar with  
12 -- with the road.

13 A. I am.

14 Q. Okay. Can you tell me what roads  
15 Hartwell Ave. travels between?

16 A. Hartwell Road?

17 Q. Yes. Did I say Hartwell Avenue?

18 A. You did.

19 Q. Okay. Can you tell me what roads  
20 Hartwell Road travels between?

21 A. Hartwell Road connects -- travels  
22 between Concord Road in Bedford and South  
23 Road in Bedford.

24 Q. Is Concord Road Route 62?



1 A. I would have to assume, since it  
2 goes to the Air Force base.

3 Q. Okay. Does -- Is Route 62 or  
4 Concord Road a means of access to the Air  
5 Force base as well?

6 A. Certainly.

7 Q. Okay. And from Route 62 where it  
8 intersects with Hartwell Road, can you  
9 tell me how you would travel to -- to the  
10 entrance to Hanscom Air Force Base from  
11 there?

12 A. From the intersection of Hartwell  
13 Road and Concord Road?

14 Q. Right.

15 A. If you were going to the base --

16 Q. Yes.

17 A. -- you would travel -- well, let's  
18 say eastbound on Hartwell Road. When you  
19 came to South Road, you would turn right  
20 and travel south on South Road. You would  
21 follow that to the intersection of South  
22 Road and Summer Street, still in Bedford.  
23 You would turn left and travel east on  
24 Summer Street into Lexington, which turns



1 into, I believe, McGuire Road. And then  
2 you would take a right onto Hartwell  
3 Avenue and travel into the air base.

4 Q. From Route 95 or 128 --

5 A. Mm-hmm.

6 Q. -- would that be a direct route to  
7 Hanscom Air Force Base, or is there a more  
8 direct route that you would take from 95  
9 or 128?

10 A. Hartwell Road in Bedford -- You  
11 would not travel on Hartwell Road to get  
12 into the base if you were on 128.

13 Q. Okay. How about Route 62?

14 A. What was the question?

15 Q. Would you travel on Route 62 from  
16 Route 95 to get to Hanscom Air Force Base?

17 A. State-numbered Route 62?

18 Q. Yes. Concord --

19 A. No.

20 Q. I'll reask the question.

21 A. No.

22 Q. Okay. And the same for South Road?

23 A. You would not travel on South Road.  
24 If you were on 128 and you were going to



1 Q. -- would you travel on -- over  
2 South Road to access Hanscom Air Force  
3 Base?

4 A. No.

5 Q. Okay.

6 A. No.

7 Q. That would not be a direct route.

8 A. No.

9 Q. Okay. Can you describe for me  
10 Hartwell Road, generally?

11 A. Hartwell Road is a two-lane  
12 roadway. The eastern part of it has  
13 granite curbing and a sidewalk on the  
14 north side. It's through a residential  
15 area. There is some town-owned land off  
16 of Hartwell Road -- again, this is on the  
17 east side of Hartwell Road. The bottom --  
18 The southern part of Hartwell Road is  
19 surrounded by industrial buildings. It is  
20 also a two-lane, paved roadway. There are  
21 no sidewalks and there's no curbing. And  
22 then west of what we call Raytheon, it,  
23 again, is a two-lane, paved roadway  
24 through a very sparsely residential area.



1 A. The real estate plans that we  
2 brought today?

3 Q. Yes.

4 A. I don't think so, no.

5 Q. Okay. So to your knowledge, the  
6 only records would be the -- the town  
7 meeting record of the town meeting votes.

8 A. Yes.

9 Q. That would reflect whether or not a  
10 road was a public way.

11 A. Yes.

12 Q. Okay. And to the best of your  
13 understanding, Exhibit Number 2 lists all  
14 of those public ways.

15 A. Yes.

16 Q. Okay. I want to ask you some  
17 questions about the maintenance of Hartwell  
18 Road.

19 A. Mm-hmm.

20 Q. Does the Town of Bedford maintain  
21 Hartwell Road?

22 A. In what -- In what aspect?

23 Q. Does the town plow Hartwell Road?

24 A. Yes, we do.



1 Q. Sand?

2 A. Yes.

3 Q. Street sweep?

4 A. Yes.

5 Q. Pave?

6 A. Not on -- We paved it where we did  
7 the sewer repairs.

8 Q. Okay. Do you know who initially  
9 paved Hartwell Road?

10 A. No.

11 Q. Do you know when the town undertook  
12 -- Well, let me finish some other  
13 questions.

14 Does the town paint the lines on  
15 the road?

16 A. We do.

17 Q. Okay. If there are potholes at the  
18 end of the winter, does the town fill  
19 those potholes?

20 A. We do.

21 Q. Okay. To your knowledge, does any  
22 other entity have responsibility for  
23 maintaining Hartwell Road?

24 A. The section of Hartwell Road that's





1 does it?

2 A. No.

3 Q. Okay. I asked you some questions  
4 about the town maintaining Hartwell  
5 Road --

6 A. Yes.

7 Q. -- and I asked you if -- and you  
8 indicated that the town plows, sweeps,  
9 paints, fills potholes. Does the town do  
10 those things over the portion of Hartwell  
11 Road which is owned by Hanscom?

12 A. Yes.

13 Q. Okay. And do you know when the  
14 Town of Bedford started doing those  
15 things?

16 A. No.

17 Q. Have they done it throughout your  
18 entire 18 years?

19 A. Yes.

20 Q. Okay. And you're not aware of  
21 anyone else either plowing, sweeping,  
22 painting or filling potholes on Hartwell  
23 Road.

24 A. I've never seen anybody else do it.



1 Q. And are you aware of any other law  
2 enforcement agency that patrols those  
3 neighborhoods?

4 A. I'm not aware of any, no.

5 Q. Now, you indicated just a moment  
6 ago something about trailer homes, correct?

7 A. Mm-hmm.

8 Q. Where are there trailer homes  
9 located on Hartwell?

10 A. They're on the north side and on  
11 the south side of Hartwell Road.

12 Q. Okay. And are those located on the  
13 area that you've indicated is owned by  
14 Hanscom?

15 A. Yes.

16 Q. And are you aware of any other law  
17 enforcement agency other than the Bedford  
18 Police that patrols those neighborhoods?

19 A. Offhand, I don't know myself, no.

20 Q. Okay. Are you familiar with where  
21 the accident occurred in this case?

22 A. Yes.

23 Q. Okay. If I represent to you -- Is  
24 that area of Hartwell Road depicted in any

